

A091 (Rev. 8/01) Criminal Complaint

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS**

*Clerk, U.S. District Court
Southern District of Texas
FILED*

AUG 11 2014

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

V.

Minerva Elodia HINOJOSA**CRIMINAL COMPLAINT**Case Number: **C-14-875M**

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about 8/9/2014 in Brooks County, in the
(Date)

Southern District of Texas, the defendant(s)

Minerva Elodia HINOJOSA

did knowingly or in a reckless disregard of the fact that an alien had come to, entered, or remained in the United States in violation of law, transport, or move or attempt to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law

in violation of Title 8 United States Code, Section(s) 8USC1324
I further state that I am a(n) Special Agent and that this complaint is based on the
following facts: Official Title

See Attached Affidavit of ICE Special Agent

Anne McGee

Continued on the attached sheet and made a part of this complaint:

☒ Yes☐ No


Signature of Complainant

Anne McGee

Printed Name of Complainant

Sworn to before me and signed in my presence, and probable cause found

August 11, 2014

Date

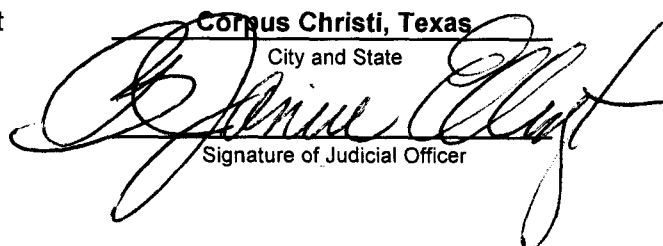
B. Janice Ellington U.S. Magistrate Judge

Name and Title of Judicial Officer

at

Corpus Christi, Texas

City and State



Signature of Judicial Officer

AFFIDIVIT

On August 9, 2014, at approximately 1830 hours, Border Patrol (BP) Agent Justin Gibbs was working primary inspection duties at the Falfurrias BP Checkpoint, when he observed a Chevy Avalanche approach the primary lane of inspection. Agent Gibbs could see three (3) visible occupants within the Avalanche. The BP Agent asked the driver, later identified as Minerva Elodia HINOJOSA, if she was a U.S. citizen, and she replied, "Yes, I am" and handed him her Identification and the birth certificates of her two (2) children. Agent Gibbs then asked where she was going and HINOJOSA replied she was going San Antonio, Texas. BP Agent Rios then advised Agent Gibbs his canine "Tiennus" was alerting to the rear vehicle and asked Agent Gibbs to check the cargo compartment. Agent Gibbs asked HINOJOSA if he could check the cargo compartment. HINOJOSA consented to the search and Agent Gibbs asked her to place the vehicle in park while he opened the rear cargo compartment. When he opened the rear tail gate he found four (4) bodies, HINOJOSA escorted them inside the checkpoint for further questioning.

Once at secondary, the four (4) people hidden in the rear compartment were questioned as to their immigration status and admitted to being in the United States without proper documentation and processed accordingly. HINOJOSA was then placed under arrest for smuggling undocumented aliens.

HINOJOSA was read her Miranda Rights and was asked if she wanted to provide a sworn statement and she consented to do so. HINOJOSA stated she had picked up the undocumented aliens about 30 miles south of USBP checkpoint Falfurrias Texas. She stated she knew they were illegal and had planned on dropping them off and charging them two hundred (\$200) dollars each for transporting them to San Antonio, Texas. Through further questioning HINOJOSA admitted to knowing a man nicknamed "Sicario", whom she frequently talked to at club Aragon near McAllen, Texas. She only knows him by that name and by a "Virgin Mary" tattoo on his left arm. She stated she attempted to borrow money from him. He offered to pay her two thousand (\$2,000) dollars for taking the undocumented aliens to San Antonio, Texas.

Raul TORRES-Moreno, a citizen of Mexico, stated he illegally waded across the Rio Grande on August 7, 2014. TORRES-Moreno said he walked to a house near the river, and stayed there one day. TORRES-Moreno said a man came to the house and told them to get in the back of a truck under a camper. TORRES-Moreno said he did not know how to get out of the truck, and he rode in the back until being caught at the BP Checkpoint. TORRES-Moreno said he did not know who was driving, and could not identify them.

Juan Jose PERALES-Carrullo, a citizen of Mexico, stated he illegally swam across the Rio Grande on January 10, 2014. PERALES-Carrullo said he walked towards Edinburg, Texas to work. PERALES-Carrullo said he lived in Edinburg and worked construction. PERALES-Carrullo said he left Edinburg to go to Houston, because they were going to pay him more. PERALES-Carrullo said today (the day he was caught) he left his house and walked to a gas station, and a smuggler picked him up in a newer blue Chevy Sedan.

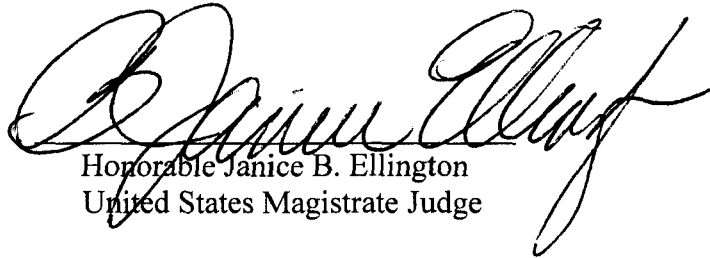
PERALES-Carrullo said he took him a Whataburger in Pharr. PERALES-Carrullo said paid the smuggler two thousand (\$2,000) dollars to smuggle him and his wife to go to Houston, Texas, and was supposed to pay another two thousand (\$2,000) dollars once arriving to Houston. PERALES-Carrullo said there was an orange Chevy truck waiting for them at the Whataburger, and they were told to get into the bed of the truck. PERALES-Carrullo said there were already two (2) other men lying in the bed. PERALES-Carrullo said the bed of the truck was covered with plastic. They then drove for about an hour with the back seats of the truck folded down while they lay in the bed. PERALES-Carrullo said the driver's two (2) young kids closed the rear seats of the truck as they approached the checkpoint. PERALES-Carrullo said they were closed in the truck bed for about three to five (3-5) minutes before being caught by the BP Agents. PERALES-Carrullo said it got really hot once they folded the seat up, and they were locked in, in the dark.

The illegal aliens required no medical attention. The aliens did not make any exculpatory statements regarding the case. AUSA Patti Booth was contacted and prosecution was accepted for violation of 8USC1324.



Anne McGee
Special Agent
Homeland Security Investigations

SWORN AND SUBSCRIBED before me, this 11th day of August 2014.



Honorable Janice B. Ellington
United States Magistrate Judge